

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
KEITH WILLIAM SHOCKER,	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
KEITH WILLIAM SHOCKER,	:	
Respondent	:	CASE NO. 1-25-bk-01800-HWV

TRUSTEE’S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 1<sup>st</sup> day of August 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Agatha R. McHale, Esquire, and objects to the confirmation of the above-referenced Debtor’s Plan for the following reasons:

1. Debtor’s Plan violates 11 U.S.C. § 1322(a)(1) and § 1325(b) in that Debtor has not submitted all or such portion of the disposable income to Trustee as required. More specifically,

Trustee alleges, and therefore avers, that Debtor’s disposable income is greater than that of which is committed to the Plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. Plan payment calculation sums of Lines 34, 35, 36, and 45.
- b. Even Plans that pay a 100% dividend to unsecured creditors are required to pay the monthly Means Test minimum amount, unless the Plan pays a 100% dividend to unsecured creditors and interest is paid to unsecured creditors at the federal judgment interest rate. See *In re Park*, 369 B.R. 205 (Bankr. M.D. Pa. 2007) and *In re Barnes*, 528 B.R. 501 (Bankr. S.D. Ga. 2015).
- c. Fiancée’s contribution.
- d. Public Transportation – Line 15 – Verify.

2. Debtor’s Plan violates 11 U.S.C. § 1322(a)(2) in that Debtor has not provided for full payment, in deferred cash payments, of all claims entitled to priority under 11 U.S.C. § 507.

3. Failure to properly state the minimum amount to be paid to unsecured creditors in Section 1.A.4. of the Plan, as required by the Means Test.

4. Trustee avers that Debtor's Plan cannot be administered due to the lack of the following:

- a. Debtor has not provided Trustee with a copy of their 2024 federal income tax return as required by § 521(e)(2)(A).

WHEREFORE, Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Agatha R. McHale, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 1<sup>st</sup> day of August 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Michael A. Cibik, Esquire  
Cibik Law, P.C.  
1500 Walnut Street  
Suite 900  
Philadelphia, PA 19102

/s/ Derek M. Stroupbauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee